

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND
Baltimore Division**

RANDY MCKINLEY,

Plaintiff,

v.

TRANS UNION, LLC,

Defendant.

Case No.

NOTICE OF REMOVAL

Pursuant to 28 U.S.C. §§ 1331, 1441, and 1446, Defendant Trans Union, LLC, (“TransUnion”) by and through its undersigned counsel, hereby removes this action filed by Plaintiff Randy McKinley (“Plaintiff”) from the District Court for Baltimore County, Maryland to the United States District Court for the District of Maryland. In support of this Notice of Removal, TransUnion states the following:

1. On March 20, 2024, Plaintiff served TransUnion with a Summons and Complaint filed in the District Court for Baltimore County, Maryland, as Case No. CVD-08-CV-24-013150. A copy of the Summons and Complaint are attached hereto as **Exhibit A**. No other process, pleadings, or orders have been served on TransUnion.

2. Attached hereto as **Exhibit B** is a copy of TransUnion’s Notice of Filing Notice of Removal to be filed in the District Court for Baltimore County, Maryland, Case No. CVD-08-CV-24-013150.

3. Plaintiff’s Complaint makes claims under, and alleges that Trans Union violated the Fair Credit Reporting Act, 15 U.S.C. § 1681 *et seq.* (“FCRA”). *See* Exhibit A, § Endorsed Complaint.

4. This Court has original jurisdiction over the subject action pursuant to 28 U.S.C. § 1331 since there is a federal question. As alleged, this suit falls within the FCRA, which thus supplies this federal question.

5. Pursuant to 28 U.S.C. § 1441, et seq., this cause may be removed from the District Court for Baltimore County, Maryland to the United States District Court for the District of Maryland.

6. Removal is timely under 28 U.S.C. § 1446 because this Notice of Removal is filed within 30 days after TransUnion's receipt of a copy of the Complaint filed in the District Court for Baltimore County, Maryland.

7. Copies of this Notice of Removal shall forthwith be served upon Plaintiff and the Clerk of Court for the District Court for Baltimore County, Maryland.

WHEREFORE, TransUnion removes this civil action from the District Court for Baltimore County, Maryland to the United States District Court for the District of Maryland.

Dated: April 4, 2024

Respectfully submitted,

TRANS UNION, LLC

By Counsel

/s/ Jacob M. Adams

Jacob M. Adams (Md. Fed. Bar No. 31004)

Geoffrey G. Grivner (Md. Fed. Bar No. 20174)

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Counsel for Defendant Trans Union, LLC

CERTIFICATE OF SERVICE

I hereby certify that on the 4th day of April, 2024, I caused a true and correct copy of the foregoing document to be served electronically via the Court's CM/ECF system. I further certify that a true and correct copy of the foregoing document was served on the following parties via First Class, U.S. Mail, postage prepaid and properly addressed as follows:

Randy McKinley
6805 Real Princess Lane
Gwynn Oak, MD 21207

Pro Se Plaintiff

/s/ Jacob M. Adams
Jacob M. Adams, Esq.

Counsel for Defendant Trans Union, LLC